

EXHIBIT A

Velez, Alexi (WDC)

From: Brittany R. Parks <bparks@smithliss.com>
Sent: Friday, November 20, 2020 7:58 PM
To: scott.wilkinson@hawks.com
Cc: sparks@khlawfirm.com; Beane, Amanda J. (SEA); Callais, Amanda R. (WDC); bryan@bryansellsllaw.com; cmcgowan@law.ga.gov; Brailey, Emily (WDC); erosenberg@lawyerscommittee.org; jpowers@lawyerscommittee.org; jgreenbaum@lawyerscommittee.org; jhouk@lawyerscommittee.org; Hamilton, Kevin J. (SEA); Elias, Marc (WDC); rwillard@law.ga.gov; Ray S. Smith, III; Emilie O. Denmark; Carla Daniel
Subject: Wood v. Raffensperger et al; Northern District of Georgia Atlanta Division; Case: 1:20-cv-04651-SDG
Attachments: Letter to S. Wilkinson, Esq. - 11-20-20 (00584371xA4094).PDF

Mr. Wilkinson,

Please see attached correspondence from Ray S. Smith, III, Esq. regarding the above-referenced matter.

Thank you.

BP

Brittany R. Parks
Paralegal to Ray S. Smith, III, Esq.

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November 20, 2020

VIA ELECTRONIC DELIVERY

Scott Wilkinson, Esq.
Executive Vice President and
Chief Legal Officer of
ATL HAWKS, LLC (DE) and
State Farm Arena
1 State Farm Drive
Atlanta, Georgia 30303
scott.wilkinson@hawks.com

**Re: L. Lin Wood, Jr. vs. Brad Raffensperger, et al.
Case No. 1:20-cv-04651-SDG**

Dear Mr. Wilkinson:

Please be advised that this office represents L. Lin Wood, Jr. in connection with the above-mentioned matter. It is our understanding that you and/or your agents, employees, or representatives are in possession of recorded video surveillance of the premises located at 1 State Farm Drive, Atlanta, Georgia 30303 (the "Premises"). The Premises includes, but is not limited to, the Suite located on Swing Level, Room 604, the hallway where said Suite/Room is located, any and all elevators providing any access to the floor of the Premises on which said Suite/Room is located, and the loading dock and loading dock entrance to the Premises.

The following items shall constitute "evidence" for the purposes of this written correspondence:

- Any and all recordings of any format, whether digital or otherwise, of the Premises, recorded at any time from 12:00 a.m. on November 3, 2020, through and including 12:00 a.m. on November 4, 2020 ("Recordings");
- Any and all storage media such as back-up tapes or similar devices which are stored and/or used primarily for "disaster recovery" of the Recordings; and
- Any and all deleted versions of the Recordings.

Please provide immediately forthwith a certified copy of the Evidence. Furthermore, ***no repairing, maintenance, altering, or destroying of said Evidence is to be done.*** You have a legal obligation to preserve the Evidence, regardless of whether any Court Order to effect the preservation of the Evidence has ever been entered, as you are hereby notified of the existence of litigation arising out of and regarding the Evidence.

Should you not be the persons and/or entity in possession, custody, or control of said Evidence, please immediately advise me of the same and immediately forward this correspondence to the proper agent who can respond accordingly to this urgent matter. ***Finally, please contact us for permission for us to conduct an inspection of the above referenced evidence. Alternatively,***

you may send us a copy of the evidence or contact my office to make arrangements to have someone recover same.

Thank you for your attention to this matter, and should you require anything further, please do not hesitate to contact me directly.

With kind regards, I am

Very truly yours,

SMITH & LISS, LLC

Ray S. Smith, III

RSS/eod

cc: Adam Martin Sparks (sparks@khlawfirm.com)
Amanda J. Beane (abeane@perkinscoie.com)
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